

7. In addition to signaling and databases, CLEC access to ILECs' Service Management Systems ("SMS") is crucial to competitive entry, even for those CLECs that do not use the ILECs' switches. Without access to an ILEC's SMS, a CLEC could not populate, modify, and update information in call-related databases. Similarly, CLECs must have access to an ILEC's Service Creation Environment ("SCE"), which is necessary to test new and innovative AIN services. Competitive entry by the CLECs will be impossible without unbundled access to the ILECs' AIN platforms and software. The CLECs should have access to all of the ILECs' AIN capabilities, including the AIN databases, SCE, and SMS, to be able to bring competitive new services into the marketplace and to maintain seamless routing and completion of traffic.

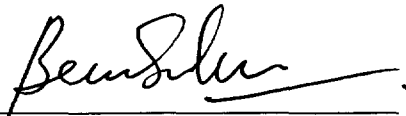
8. Contrary to the ILECs' claims, the AIN architecture is not proprietary and has always been meant to open the network interface. In fact, AIN was developed and standardized to give carriers the capability to open and customize new services quickly and to provide seamless interconnectivity between networks. In any event, even if an ILEC's customized AIN services are deemed to be proprietary, see, e.g., Ameritech Comments at 127; BellSouth Comments at 80, the AIN deployment -- that is, the exchange of trigger and database information required to process an AIN call -- should never be considered proprietary. The AIN architecture was standardized by the International Telecommunications Union ("ITU") and modified by the American National Standards Institute ("ANSI") precisely to facilitate the development and provision of new and innovative telecommunications services. Without access to the ILECs' AIN systems and databases, CLECs would be unable to gain access to crucial information that cannot be duplicated outside the ILECs' AIN architecture.

9. The mere fact that CLECs have not yet sought access to certain ILECs' AIN platform or services has no bearing on the critical importance of those elements. The ILECs have employed numerous tools -- appeals of arbitrations, refusal to combine unbundled elements

normally combined within their networks, poor or non-existent interfaces into their OSS, and more -- to make it difficult for CLECs to utilize unbundled switching. As a result, MCI WorldCom is currently using unbundled switch ports as an entry vehicle in one state: New York. Because the CLECs' use of unbundled switching has to date focused on such mundane matters as keeping customers from losing dial tone and assuring that features ordered are provisioned on the customers' lines, CLECs have not yet begun to explore the more advanced capabilities of switching that would be possible, at least theoretically, via the use of SS7 signaling and call-related databases.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on June 9th, 1999.

  
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Dr. Bernard S. Ku



**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

<b>In the Matter of:</b>	)	
	)	
<b>Implementation of the Local Competition Provisions in the Telecommunications Act of 1996</b>	)	<b>CC Docket No. 96-98</b>
	)	
	)	
<b>Interconnection between Local Exchange Carriers and Commercial Mobile Radio Service Providers</b>	)	<b>CC Docket No. 95-185</b>
	)	

**REPLY DECLARATION OF JOHN SIVORI  
on Behalf of MCI WORLDCOM, Inc.**

Based on my personal knowledge and on information learned in the course of my business duties, I, John Sivori, declare as follows:

1. My name is John Sivori. I am Senior Manager in MCI WORLDCOM, Inc.'s ("MCI WorldCom") Information Technology Organization. My duties include the planning and implementation of electronic interfaces for pre-ordering and ordering operations in support of MCI WorldCom's entry into local telecommunications markets nationwide. From 1986 through 1996, I was a member of the Telecommunications Industry Forum ("TCIF") Executive Board, and served as chairman of the TCIF Electronic Data Interchange ("EDI") Committee and the TCIF Electronic Commerce Committee.

2. I have reviewed the comments in this proceeding related to operations support systems ("OSS"). Competitive local exchange carriers ("CLECs") cannot obtain reasonable and nondiscriminatory access to incumbent local exchange carriers' ("ILECs") unbundled network elements without reasonable and nondiscriminatory access to the ILECs' OSS. Moreover, for CLECs to compete effectively using unbundled network elements, their

access to ILECs' OSS must not be limited in any way that would prevent the CLECs from offering the most advanced and innovative services possible using those network elements. For this reason, CLECs would be impaired if the Commission adopted the proposals of BellSouth, SBC, and U S West that OSS should be unbundled only to the extent that it is used to support the network element or elements obtained from the ILEC itself.

3. One straightforward example should make this clear. It may be possible in some locations for a CLEC to lease an unbundled loop from an ILEC and to self-provision or to contract with a third-party vendor for additional elements that permit the CLEC to offer digital subscriber line ("DSL") service over that loop. To provide DSL services using non-ILEC elements, the CLEC will nonetheless require access to certain ILEC OSS functional transactions, such as pre-ordering "loop qualification," the process by which it is determined whether copper loops in their current condition can support DSL. If an ILEC refuses to provide this OSS function on the grounds that a third party or the CLEC itself, and not the ILEC, is providing the DSL service, the CLEC will be impaired in its provision of this strategically important service. More generally, no matter what type of service a CLEC wishes to offer, it must have access to the ILEC's pre-order systems so that it can determine the correct customer service location, the customer's current features and functions, and the customer's directory listing. In addition, the CLEC must be able to access the ILEC systems to determine when a customer has been migrated to the CLEC and billing changes have taken place.

4. As the preceding discussion demonstrates, CLECs' ability to offer high-quality innovative services would be impaired if CLECs do not have access to OSS. In addition, as the Commission itself has recognized, failure to provide access on reasonable and nondiscriminatory terms would undermine CLEC competitiveness, as well as violate the plain requirements of section 251(c)(3) of the 1996 Act. For access to OSS truly to be reasonable and

nondiscriminatory, the Commission's rules should require uniform OSS interfaces, exit criteria for successful testing of OSS, and adequate change management controls.

5. Uniform interfaces are required to overcome the enormous financial barrier imposed by the need for CLECs to build and implement different interfaces to the multitude of ILECs OSS systems across the country. In this context, it is important to note that "standards-based" is not the same as "uniform." The industry standards include hundreds of interface specification variables that are optional, or left to be agreed to in a bilateral implementation agreement. A difference in one variable can create two different OSS interface implementations. Without further regulatory intervention, CLECs will be faced with multiple, unique, non-interoperable OSS implementations. Even for large CLECs, the cost of developing and supporting many different OSS interface implementations nationwide is prohibitive. The lack of uniformity prevents OSS software vendors from using economies of scale to lower the costs of OSS interface software. Because of this financial barrier, OSS interfaces must be built, implemented, tested, and operated according to the same specifications throughout the nation. Any differences can be accommodated on the ILECs' side of the interface through application of logic, maps, business rules engines, or other available software technologies. Thereby, a uniform OSS implementation specification can be established for CLECs to use, in any ILEC region, with the same business rules, data models, transaction transport method, and interoperability test case scenarios.

6. Exit criteria for nondiscriminatory OSS access must be verified by successful real-world testing. This testing must show that an ILEC's application-to-application interfaces and related back-end systems are compliant with the relevant standards and guidelines, uniform across all regions, and implemented to support seamless end-to-end interoperability for all necessary OSS functions. Seamless in this context means without manual intervention.

Specifically, the ILEC should demonstrate seamless transaction processing and subsequent back-end automated activities for the following functions: pre-ordering, ordering, provisioning, billing, and maintenance and repair. This testing should be completed for a full range of test business use case scenarios, and at commercial volumes. Only through this testing can CLECs be assured of operational nondiscrimination.


7. Finally, for access to OSS to be reasonable and nondiscriminatory, the ILEC must implement an adequate change management control process. The industry guidelines must be complied with; however, the guidelines are frequently vague, with many specifics left to negotiation between contracting parties. To ensure nondiscriminatory access, the following minimum requirements should be imposed to supplement the guidelines:

- establishment of an ILEC/CLEC collaborative forum with equal authority for “change issue” acceptance and prioritization by the ILEC and the CLECs as a group;
- successfully tested operational production baseline implementation with complete and accurate matching specifications;
- proper notice and documentation from the ILEC of all issues proposed for change;
- sufficient time for review, comment, and collaborative discussion with respect to each issue;
- a formal, recorded ILEC/CLEC collaborative decision to make and prioritize a change;
- issuance of accurate and complete specifications for the OSS interface change by the ILEC with enough time for all parties to develop, implement, and test the change;



- complete testing of the change, beginning with regression testing to ensure that no previously working functions have been disrupted by the change.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on June 10, 1999.



John Sivori